

Application No.: 10/003773

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**REMARKS**

Claims 1-34 are pending of which claims 1, 25, 27, 30, and 31 are independent. Claims 1-2, 4-5, 8-12, 24-25, 27 and 30-33 have been amended. No claims have been added or deleted. No new matter has been added.

**Claim Rejections Pursuant to 35 U.S.C. §112**

The Examiner rejected a number of claims as being vague and indefinite or for lacking a sufficient antecedent basis. Unless otherwise specifically addressed below, Applicants have amended the identified claims to address the Examiner's concerns.

With regard to the Examiner's rejection of claim 14 based on the Examiner's citing an insufficient antecedent basis for the limitation "the parsed data", Applicants respectfully traverse the rejection. The antecedent basis for "the parsed data" in line 4 may be found in line 3 of claim 14 which begins "parsing the data". The claim limitation "parsing the data" in line 3 results in "parsed data" which provides a sufficient antecedent basis for "the parsed data" limitation found in line 4.

Applicants have treated the Examiner's rejection of claim 26 as directed to claim 27 and made the requested amendment in claim 27.

Applicants respectfully traverse the rejection of claim 2 for lacking a proper antecedent basis for the claim limitation "the metastructure" in line 4. Claim 2 is dependent upon claim 1 which includes the claim limitation "a metastructure" on line 10.

Applicants respectfully traverse the Examiner's rejection of claims 4 and 6 as lacking a sufficient antecedent basis for the claim limitation "said label". The Examiner's attention is respectfully directed to line 3 in claim 4 (as amended —claim 4 was amended for other reasons) and line 2 in claim 6 which begins "attaching a label" earlier in the sentence in which "said label" appears. Although not needed to overcome the rejection, Applicants also respectfully

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note that the term "a label" in claim 1 also would have provided a sufficient antecedent basis as clearly claims 4 and 6 are referring to the situation where the label is being altered (second option in claim 1). An action that affects one of a group of two or more does not make the claim indefinite or affect the antecedent basis of claims dependent thereon.

Claim Rejections Pursuant to 35 U.S.C. §102

Claim 1-34 were rejected as being anticipated by Rivette et al (United States Patent Number 10/003, 773, hereafter "Rivette"). For the reasons set forth below, these rejections are respectfully traversed.

Summary of Claimed Invention

The claimed invention claims a method for cross-referencing, searching and displaying entries in a document publishing system. The publishing system uses input data such as email messages, attachments to emails, web clippings, audio and video data files, and user input text, to create new documents, such as web pages viewable via a web browser. Unique identification numbers are automatically assigned to entries in the publishing system and naturally occurring segments of entries, such as headings and paragraphs separated by white space. User assigned labels may be attached to user selected segments of each entry. The identification numbers and labels are cross-linked by a series of algorithms. Changes in content of an entry are saved as updates with the latest version cross-linked to previous versions. The labels applied to the previous version of the entry are automatically applied to the corresponding segments of the updated entry, even if the labeled segments are updated or rearranged by the update action. The cross-linking of entries enables users to search by time (content), by topic (label), or both. Different versions of content in an entry may be displayed to a user such that the evolution of an entry over time is revealed. Searching may also be conducted using labels or topics as keywords such that either user-attached labels or automatically generated labels from the cross-linking algorithms are used to generate documents for users which display references to entries and/or items containing the particular label or topic. Documents generated by the illustrative embodiment include links to other entries and/or items which are associated with the content being displayed to the user. The user assigned labels also enable a search mechanism to quickly

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assemble user-defined relevant portions of each entry while omitting extraneous matters contained in the entries.

#### Summary of Claim Amendments

Applicants have amended independent claims 25 and 31 to clarify that each of the entries containing data has an associated metastructure that is updated to reflect changes in the data in the entry or a label associated with the entry.

#### Summary of Rivette

Rivette discusses a mechanism for manipulating notes linked to data objects and to manipulating the data objects. The system describes the creation of notes which include one or more sub-notes which are linked to data objects associated with different applications (word processors, spreadsheets, database applications etc.). The associated portions to which the sub-notes are linked may overlap between sub-notes. The user is able to access the data object through the sub-notes and the linkage between sub-notes and data objects and between sub-notes may be adjusted by the user. As stated in the patent (col. 6, lines 6-12):

“The invention is adapted to memorialize and/or institutionalize a person’s or group’s thinking and work product regarding a subject. If a person or group’s thinking and work product are not memorialized or institutionalized, then such thinking and work product may be lost or not accessible when needed if the person or group becomes unavailable, or is unable to remember its thinking, or loses its work product.”

Put another way, the system in Rivette is designed to collect impressions and thoughts for a project together with the data upon which those impressions and thoughts are based

#### Argument

The cited reference Rivette fails to disclose all of the elements of Applicants’ independent claims. Accordingly, Rivette fails to anticipate any of the pending claims in Applicants invention.

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Applicants claimed invention is designed to allow a user to track the transformation and evolution of a data object and its associated labels over time. A metastructure is associated with each entry and includes information which allows the evolution of the object and its associated labels to be followed over time as the data object is altered and new labels are added, deleted or changed. To that end, independent claim 1 and the amended independent claim 25 includes the limitation:

“updating a metastructure associated with said selected entry to reflect relationship changes caused by said new entry, said updating including a time said selected entry was altered:”[emphasis added]

Variations of this claim limitation are found in all of Applicant’s independent claims( and therefore all of the other claims that are dependent thereon). Thus, independent claim 27 provides:

“updating a metastructure associated with said selected entry to indicate a time said selected entry was altered:”[emphasis added]

Independent claim 30 indicates:

“storing in a data structure associated with said selected entry a time said labels became associated with said selected entry”[emphasis added]

and independent claim 31 as amended provides:

“...each said entry having an associated metastructure that is updated to reflect a time of an alteration of an associated entry or a label associated with the entry.” [emphasis added]

Rivette fails to disclose these limitations and therefore fails to anticipate any of Applicants claims.

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As noted above, Rivette is designed for a user to coordinate their notes on a project and allow the notes to be used as a basis to retrieve the actual data object. In contrast to the Applicants claimed invention, the system in Rivette is not designed to track the evolution of the underlying data object. The patent discusses the ability to generate different sub-notes linked to different portions of a data object but does not discuss the alteration of the underlying data object or a label for the data object. Furthermore, in Applicant's claimed invention, the metastructure associated with an entry is updated every time either the entry or a label associated with the entry is altered (see claim limitations above). This limitation is simply not found in Rivette.

The Examiner cited col. 30, lines 22-36 as disclosing the limitation found in claim 1 of "updating a metastructure associated with said selected entry to reflect relationship changes caused by said new entry, said updating including a time said selected entry was altered". A careful reading of the cited section ( and the rest of Rivette) fails to disclose either 1) the required metastructure associated with the selected entry/data object, or 2) the updating of the structure to reflect an alteration of the data in the entry or a label associated with the entry. The cited section discusses the linking of the data object to a new sub-note (col. 30, lines 22-23). It discusses the updating of a view of the data object and the active note (col. 30, lines 23-25). It discusses the storage of information identifying the data object in a field of the new sub note node (col. 30, lines 28-30). It indicates an example of the information as the name of the data object (col. 30, line 31). It indicates information identifying the application associated with the data object may be stored (col. 30, lines 31-33). It also indicates that the information to be stored in the object identifier field may be obtained by querying the application associated with the data object (col. 30, lines 34-36). It does not disclose Applicants claim requirements of updating a metastructure associated with the selected entry to reflect the time of the altering of the entry or an associated label. Accordingly, Applicants request the allowance of claims 1-24 and 32-34.

Applicants have amended claim 25 (upon which claim 26 is dependent) to include the limitation of "updating a metastructure associated with said selected entry to reflect relationship changes caused by said new entry, said updating including a time said selected entry was altered". The new limitation clarifies that each entry (the data object in Rivette's system) includes a metastructure that is updated if either its' data or a label associated with the data is



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updated. The Examiner had cited col. 21, lines 29-36 which indicated that the system in Rivette can search a database for replication purposes so as to copy one project database to another (see col. 21, lines 4-36). The Examiner pointed to language referring to standard database replication which indicated the search for replication elements may be based on time of creation/modification of database elements. An example would be a property of a document telling its date of creation. This is a separate concept from the claimed invention which requires that the metastructure associated with the selected entry is updated to reflect relationship changes if the data in an entry is altered to create a new entry (thus allowing the tracking of the evolution of the entry over time). The Rivette system does not allow the relationship changes to be tracked. Accordingly, since all of Applicants claim elements are not disclosed, Applicants request the allowance of claim 25-26.

Claim 27 (upon which claims 28-29 are dependent) also includes the element of "updating a metastructure associated with said selected entry to indicate a time said selected entry was altered". The Examiner cited col. 21, lines 29-36 as disclosing this element. As set forth above, the cited section of Rivette fails to disclose all of Applicants' claim elements. Applicants also note that the sections of the reference cited by the Examiner are discussing a sub-note node rather than a node associated with the selected entry/data object to which the sub-note is linked. In Applicants' invention, the claimed metastructure is associated with the selected entry, not a metastructure for the label or a metastructure for a new entry. Accordingly, Applicants request the allowance of claims 27-29.

In rejecting claim 30, the Examiner cited col. 21, lines 29-36. As noted above, this section fails to disclose all of the elements of Applicants independent claim and Applicants therefore request the allowance of claim 30.

Applicants have amended claim 31 to include the element of "each said entry having an associated metastructure that is updated to reflect a time of an alteration of an associated entry or a label associated with the entry". Applicants submit the claim is allowable for the reasons discussed above in the discussion of the other independent claims.

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**CONCLUSION**

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

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